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ABSTRACT

This paper discusses potential problems of non-licensable counselors and psychologists in counseling center settings. Special mention is made of potential problems of non-licensable center directors in view of the standards established by the International Association of Counseling Services, Incorporated, and the Standards for Providers of Psychological Services of the American Psychological Association. It further discusses implications of independent licensing of counselors as "health service providers," and mentions the attempt in Florida to rewrite psychologist licensing regulations to allow doctoral level counselors to qualify as psychologists. (Author)

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Licensure: The Challenge to Counseling Practitioners

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I think we are approaching a very critical time for people with doctorates in counseling who are - or wish to be - employed in counseling centers, state agencies, or in private practice as "health service providers." Counselors, as such, do not enjoy recognition by the public, legislature, insurance companies, state or federal agencies - or even other counselors - as full-fledged, qualified health-service providers. A "guidance counselor" is seen as someone who helps kids deal with school problems and choose a career -- and that is all! Counseling, as a profession, has a long way to go before its practitioners are given the same professional recognition as psychologists, including counseling psychologists. This is especially frustrating to those of us who feel we perform the following functions:

> ...rendering to individuals, groups, organizations, or the public any psychological service involving the application of principles, methods, and procedures of understanding, predicting, and influencing behavior, such as the principles pertaining to learning, perception, motivation, thinking, emotions, and interpersonal relationships; the methods and procedures of interviewing, counseling, and psychotherapy; of constructing, administering, and interpreting tests of mental abilities; aptitudes, interests, attitudes, personality characteristics, emotion, and motivation; and of assessing public opinion.
>
> The application of said principles and methods includes, but is not restricted to: diagnosis, prevention, and amelioration of adjustment problems and emotional and mental disorders of individuals and groups; hypnosis; educational and vocational counseling; personal selection and management; the evaluation and planning for effective work and learning situations; advertising and market research; and the resolution of interpersonal and social conflicts.

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The preceding is from "A Model For State Legislation Affecting the Practice of Psychology", (American Psychologist, 1967) and is preceded by the words: "The practice of psychology within the meaning of this act is defined as..."

This is the definition of psychological practice upon which many state psychology licensing acts are based. Even though such statutes describe functions many counselors perform daily, many counselors in many states are finding that they are not qualified by the nature of the origin of their degrees to become licensed to perform these functions. This is true because most states do not have counselor licensing laws and because many states do not allow "counselors" to become licensed as psychologists. The problems of counselors being licensed as psychologists are well-documented elsewhere (Morgan, 1976; Morgan, 1975; Cottingham, 1975; Sweeney and Sturdevant, 1974). The problems have been addressed directly by Division 17 (Counseling) of the American Psychological Association. It has begun to be addressed by APGA and several of its divisions.

The problems for counselors who are not licensed psychologists are becoming critical. This is especially true in Counseling Centers in state-supported institutions. It is my understanding that the International Association of Counseling Services, Incorporated, an accrediting agency of psychological and counseling service agencies requires a licensed psychologist as the head of any such agency before it will grant accreditation.* Similarly, the recently adopted Standards For Providers of Psychological Services of the American Psychological Association (American Psychologist, 1975, 30(6), 685-694) require a licensed psychologist to

*At the presentation of this paper at the 1976 APGA convention, a spokesman for IACS noted that this statement is in error. It is recommended that the reader refer to the most recent IACS directory for the recommendations about licensure of center directors.

head any agency offering psychological services, and specifically recommend that state agencies not be exempt from such requirements. These same Standards recommend that any person employed as a "psychologist" be licensed as a psychologist. If such standards are adopted in Florida, at least two existing counseling center directors would no longer be qualified to run their centers! Many community college counseling centers would cease to exist if their services were construed to be "psychological services".

One should also consider that a counseling center director is considered to be the supervisor of his staff. A new Ph.D. in psychology trying to meet the supervised experience requirements for licensure in a counseling center - or other agency - headed by a non-licensible (as a psychologist) person could run into some difficulty. Graduate students supervised by non-licensible staff will need some paper juggling to be sure they are not deemed improperly trained. These are additional problems in the area of training of psychology and counseling practicum students and interns which could be addressed here, but will not be.

One solution to these problems is to try to bring pressure to bear on state psychological licensing boards to admit counselors to the psychology licensing exams. Where this is not possible by virtue of the way the law is written, an attempt can be made to revise the law so that counselors <u>can</u> qualify to be considered for licensure as psychologists. This latter approach is the one being taken in Florida now. It is an attempt to alter the existing Psychological Practices Act in two basic ways - to expand the definition of "psychologist" to require that fully-trained doctoral

level counselors be considered for licensing as psychologists and to add provisions for licensure of marriage and family counselors and clinical social workers. The bill as it is written has the support of the Florida Association of School Psychologists, Citizens for Equal Opportunity in Licensing of Psychologists, Florida Association of Marriage and Family Counselors, Florida Society for Clinical Social Workers, Pastoral Counseling Center, Florida A.C.E.S., Florida Mental Health Association, and the Florida Personnel and Guidance Association.

It is opposed by the Florida Psychological Association (although the total membership, in general assembly, refused to take a stand against it) and the American Psychological Association. The specific issues - pro and con - about the proposed legislation are discussed in articles by Rothman and Gessner in the Florida Psychologist (March, 1976).

Even the passage of this law may not solve the problems of counselors wishing to engage in private practice. Recently a state agency in Florida formed a set of guidelines which allows licensed psychologists to perform consulting services for the agency only if:

I. They are licensed by the state as psychologists - and -

II. (a) They are graduates of APA approved doctoral programs - or -

(b) They are diplomates of the American Board of Professional Psychology (ABPP) - or -

(c) They have applied for ABPP status but action is pending.

These rules will undoubtably face a court challenge as they appear to abrogate the rights of licensed psychologists to practice their profession. Challenges to the credentials of counselors licensed as psychologists by insurance carriers might also occur. The prospect

of broadened licensing laws wrecking progress made in securing freedom-of-choice provisions in insurance coverage plans has many "clinical" psychologists in opposition to such laws. They may be accurate in their fears.

The alternative to seeking licensure as psychologists is seeking legislation to license counselors. This is a formidable step in itself. However, this would only be the first step. Even if licensure of counselors authorizes them to perform the exact functions which psychologists perform, state and federal regulations and statues would have to be rewritten to guarantee that counselors and psychologists would receive equal consideration for jobs that each could perform equally well by virtue of their training. This would probably include almost all administrative positions occupied now by psychologists only (or counselors only). It would include many consulting and direct-delivery-of-service positions. It should not be difficult to predict that the struggles clinical psychology has undergone with psychiatry, will now take place between "counselors" and "psychologists".

There might be some merit to the argument that some counselors are, in fact, counseling psychologists. I certainly identify myself that way, even though my degree is an Ed.D. in "Personnel Services." I feel comfortable calling myself by this title because my coursework was highly "psychological" in content, my dissertation was psychological in nature (Internal versus External Control Correlates Among Counseling Center Clients, University of Florida, 1967), and my practicum and internship experiences were exclusively in Counseling Center settings. Also, I am employed in a position at the University of Florida Counseling Center with the title, Counseling Psychologist. I'm sure that I would

not agree that all of the students who have doctoral degrees from my same department are qualified to offer direct psychological services. To ward off the criticism that I'm a snob, I also think that not all Ph.D.s in clinical psychology whom I have known and helped train are qualified to offer these services either.

I mention these things only to point out that this problem we face is not a simple one with any quick and easy solutions. It requires all the openness and resourcefulness we can muster. It also requires that we begin taking definite action now. I urge all counselors to study the documents listed above and the recent proposals of the APGA Commission on Licensure to try to determine just what action they may want to take.

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